Staff Role and Responsibility

Proposed Policy Change Approved on First Reading

The Higher Learning Commission (HLC) Board of Trustees (“the Board”) approved this policy on first reading at its meeting on November 5–6, 2020.

Background

The proposed policy revision would clarify the role of staff in evaluation visits, clarify key aspects of the staff role beyond evaluation visits and reflect recent updates to and codification of conflict of interest procedures for HLC staff.

Comments Invited

HLC invites comments on this change before the Board takes final action at its meeting on February 25–26, 2021. Comments can be sent to policycomments@hlcommission.org. Comments are due by January 18, 2021.

Proposed Change

Wording that was deleted or revised is shown as strikethrough (old wording); new language, whether through addition or revision, is shown in bold (new wording).

Policy Title: Staff Role and Responsibility

The HLC staff of the Commission shall be ultimately responsible to the President of the Commission, or and to any intermediate supervisor who reports to the President, who in turn shall be responsible to the Board of Trustees. The staff shall assist institutions in the accreditation processes, implement Commission HLC policy, and carry out other responsibilities given it by the President and by Commission policy but shall not serve as an advocate for any is not a representative for the institution in the accreditation relationship. The
Commission HLC staff shall have the discretion to establish and modify Commission procedures in keeping with the intention and spirit of Commission HLC policy.

Institutional Liaison
A staff member of the Commission HLC shall be assigned to each affiliated member institution to serve as the primary liaison between the Commission HLC and the institution, and to ensure that the institution receives effective service on behalf of the Commission.

Commission Staff on Non-Evaluative Visits
The staff liaison may conduct a non-evaluative Staff Campus Visit based on an institution’s invitation. Such a visit has no bearing on the outcomes of the institution’s pending evaluations, or any of HLC’s procedural decisions concerning the institution.

Commission Staff on Evaluation Visits
The staff liaison or other Commission staff members may accompany the evaluation team on certain visits. These visits include:

- Advisory Visits
- Visits for Removal of Sanction or Show-Cause
- Visits for Candidacy or initial accreditation

The President of the Commission HLC shall determine whether the staff liaison or other Commission staff members will accompany a specific evaluation visit. The Commission President also has the discretion to determine that circumstances warrant having a staff liaison or other Commission staff member accompany evaluation visits other than those visits expressly noted above.

The role of a staff member accompanying any evaluation visit may be (1) to support the team as needed in its evaluation, including with guidance on Commission HLC policy and procedure; (2) to answer questions from the public or institutional representatives about clarify Commission HLC processes related to the visit to institutional representatives; (3) as part of an onboarding or training exercise; and (3) or (4) to observe the visit. When preparing to take any action regarding the institution as a result of the visit, the Board of Trustees or Institutional Actions Council may ask the Commission staff member to discuss the evaluation visit and the institution’s accreditation history, but the staff member will not prepare any written
HLC may authorize staff or employ other individuals with appropriate expertise to prepare memoranda, analyses, summations or resolutions for HLC decision-making bodies based on established procedures.

In addition, Commission staff shall participate as a team member in any Fact-Finding Team related to Change of Control, Structure or Organization or in any on-site investigation of any serious complaint or legal, ethical or other related issue at an institution.

Staff **Objectivity and Conflict of Interest**

The President will remove any liaison activities with an institution from a member of the professional staff when it appears that a conflict of interest might be present. It shall be a matter of staff responsibility for staff to inform the President when a potential conflict of interest might exist. In determining conflict of interest, staff shall weigh such things as past attendance, previous and/or prospective employment, the status at an institution of close personal friends or family members, or the holding of privileged information not available to others involved in the evaluation process.

The President has final authority for making all determinations regarding objectivity and conflict of interest. Staff shall adhere to internal policies and procedures established by HLC to ensure timely and accurate disclosure of circumstances that may lead to the identification and management of any potential conflicts of interest or other objectivity concerns.

Policy Number Key

*Section COMM: Commission Obligations*

*Chapter B: Commission Staff*

*Part 10: General*

_Last Revised: November 2012_

*First Adopted: January 1983, November 1991_

*Revision History: November 2012_

*Notes: Policies combined in November 2012 – 14.1, 14.2, 15.1_

*Related Policies:*